

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed January 14, 2005. At the time of the Office Action, Claims 1-2, 5-7, 10-11, 14-16, and 19-30 were pending in this Application. Claims 3, 4, 8, 9, 12, 13, 17, and 18 were previously cancelled by Applicants without prejudice or disclaimer.

Status of Co-Pending Cases

The cases recited in the List of Related Cases on page 1 have the following status:

Attorney Docket No.	Serial No.	Status
068082.0105	09/862,832	Office Action Mailed 01/21/05
068082.0106	09/971,334	Final Office Action Mailed 04/07/05
068082.0112	09/865,804	Response to Office Action Filed 05/31/05
068082.0113	09/865,735	Issue Fee Paid 05/09/05
068082.0114	09/862,814	Final Office Action Mailed 04/04/05
068082.0115	09/865,805	Response to Office Action Filed 03/08/05
068082.0117	09/970,563	Office Action Mailed 01/13/05

This patent application is most similar to U.S. Application Serial No. 09/865,804, and differs with respect to features of the profiles generation system.

Amendments to the Specification

Applicants have requested above that several references on page 29 to a "server 115" be amended to "server 101c". There is no element 115 in the drawings. The amendments bring FIGURE 11 into agreement with the text and with FIGURE 10.

Rejections under 35 U.S.C. §102

Claims 1, 5-7, 10, 14-16, and 19-30 stand rejected by the Examiner under 35 U.S.C. §102(e) as being anticipate by International Publication No. WO 00/23929 filed by Alvin (hereinafter "Alvin").

Claims 1 and 10 (the independent claims) have been amended to more clearly distinguish the present invention from the teachings of Alvin.

Applicants reply that Claims 1 and 10 as amended, is not obvious from the cited references. There are a number of important distinctions between the invention of Claims 1 and 10 and the teachings of Alvin.

Support for the amendments of Claims 1 and 10 is especially explicit in connection with FIGURES 4, 5, 10, and 11 and the accompanying descriptions on pages 14-18 and 27-29. As described therein, the system of FIGURE 4 may be integrated with the prospects harvester of FIGURE 10.

The system of FIGURE 4 is a customer profile system. It provides data representing purchasing behavior of existing customers of the business enterprise. The data is obtained from existing internal records of the business enterprise.

The system of FIGURE 10 is a prospects harvester system. It provides contact data for prospective customers of the business enterprise. The data is obtained from Internet text sources.

The system of FIGURE 11 integrates these two databases. The result is a text indexing server that indexes the data from the harvester system. It also accepts queries from a business enterprise. The server conducts two searches for two types of data from two different sources: for customer profile data from datamart 41b/111 (FIGURES 4/10) and for contact data from text archive 101b (FIGURE 10). The first type of data represents existing customers; the second type of data represents prospective customers. The result of the search is contact information (for prospective customers) based on customer profile data (representing existing customers).

Likewise, the corresponding methods of FIGURES 5 and 11 may be integrated. Reference may also be made to FIGURE 2, which also illustrates how a server may be used to integrate data from both a profiles generator (FIGURE 4) and a prospects harvester (FIGURE 10).

These features of the invention are clearly recited in Claims 1 and 11 as amended. The following lists several fundamental differences between the present invention and the

invention of Alvin. Claims 1 and 11 also recite numerous additional distinctions that will be discussed in a future response if necessary.

(1) Users and recipients of information

The web server of the present invention serves a business enterprise. It accepts queries from the business enterprise and provides the business enterprise with contact information for prospective customers. The business enterprise uses a web browser and receives the information generated by the system of Claim 1.

Thus, in Claim 1, the business enterprise is the active user of the method. Potential customers of the enterprise are not aware of, or active in, the method.

Alvin is directed to on-line shopping. The customers themselves are the active users of the method. They input their own customer data. This data is used for two purposes: for generating the on-line sales presentation (page 11, lines 21-27) and for setting up a customer account (page 24, lines 12-17).

(2) Customer Profiles System

Claim 1 recites searching internal records of the business enterprise to obtain profile information. The profile data of the present invention is extracted from pre-existing data, without any entry by the customer.

In Alvin, the customers enter the profile data by their own activities. This is not the same as a profiles generator that accesses internal records of a business enterprise, without activity by customers.

(3) Prospects Harvester System

Claim 1 recites that the harvester searches "Internet text sources" for contact information. The harvester finds data for prospective customers. By definition, these are customers who are unaware that the business enterprise is attempting to sell to them.

Alvin does not teach or suggest how to obtain contact information for potential customers. Alvin only teaches on-line shopping for existing customers, who are voluntarily visiting a retail shopping website.

Claim 1 further recites that the indexing server accesses data from two databases: one provided by the customer profiles system and one provided by the prospects harvester system. The server receives a query from a business enterprise for contact data for potential purchasers of a particular product or service. The index server matches data from the text archive to data from the profiles database.

As an example, an enterprise might enter a query for prospective buyers of digital photo printers. The profile data might indicate that purchasers of digital cameras have a high preference for photo printers. Thus, in response to a query for prospective buyers of photo printers, the index server would search Internet text sources for persons discussing digital cameras.

Alvin does not teach or suggest this approach to finding potential customers. That is, Alvin does not teach or suggest using profile data from one type of database to design a search by a prospects harvester from another type of database.

For the above reasons, Alvin does not teach or suggest the invention of Claim 1. Alvin has no equivalent to the "profiles system" or the "harvester system" of the present invention. Even if such elements were present in Alvin, the limitations of the present invention would distinguish them from Alvin.

The Examiner seems to think that the present invention and Alvin are different applications of the same elements. This far from the case. The applications are different, and the elements are different.

In fact, Alvin teaches away from the present invention by teaching that customers must voluntarily visit a website. There is no need in Alvin for a retailer (business enterprise) to contact prospective customers..

Nor are the features discussed above present in the teachings of Bakalash, which was cited by the Examiner for its teachings regarding OLAP.

Claim 10 has been amended in a manner similar to Claim 1. It is allowable for the same reasons as discussed above. Claims 3, 4, 8, 9, 12, 13, 17, 18, 20, 21, and 25-27 are requested to be cancelled. The remaining claims are dependent on Claims 1 or 10, and are allowable for the same reasons as the claims from which they depend.

Information Disclosure Statement

Applicants also enclose an Information Disclosure Statement and PTO Form 1449, with a copy of the references and a check in the amount of \$180.00, for the Examiner's review and consideration.

CONCLUSION

Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicants respectfully request reconsideration of all pending claims, as amended.

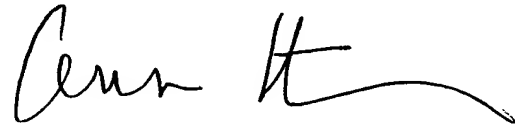
Applicants enclose a Petition for a two-month Extension of Time. Applicants also enclose a check in the amount of \$225.00 for the Extension fee.

Applicants believe there are no additional fees due, however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2634.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorney for Applicants



Ann C. Livingston
Reg. No. 32,479

SEND CORRESPONDENCE TO:
Baker Botts L.L.P.
CUSTOMER ACCOUNT NO. **31625**
512.322.2634
512.322.8325 (fax)

Date: 5/31/05